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11 UNITED STATES DISTRICT COURT

12 DISTRICT OF NEVADA

13 TERRELL DESHON KEMP, SR.,

14 Plaintiff,

15 vs.

16 LAS VEGAS METROPOLITAN POLICE
DEPARTMENT; JAIL DIRECTOR
CAPTAIN SCHMIDT, in her individual and
17 official capacities; CORRECTIONAL
OFFICER HUGH HARDY, #6000;
NAPHCARE, INC., a Foreign Corporation;
18 DIRECTOR OF NURSING, ASHLEY
KOMASCAR, in her individual and official
19 capacities; LARRY WILLIAMSON M.D., in
his individual and official capacities,

20 Defendants.
21

CASE NO.: 2:18-cv-00169-RFB-BNW

**STIPULATION TO EXTEND
DISPOSITIVE MOTION DEADLINE
(First Request)
[ECF No. 81]**

22 Pursuant to LR 6-1 and LR 26-4, Defendants, Las Vegas Metropolitan Police
23 Department, Captain Nita Schmidt, and Officer Hugh Hardy (“LVMPD Defendants”);
24 Defendants, Larry Williamson, M.D., Ashley E. Komacsar, Director of Nursing; and Naphcare,

1 Inc. (“Naphcare Defendants”); and Plaintiff, Terrell Deshon Kemp, Sr. (“Plaintiff”) by and
2 through their respective counsel, hereby stipulate, agree, and request that this Court extend the
3 dispositive motion deadline from the current date of February 1, 2021 as the parties anticipate
4 additional time is needed to prepare the Motions due to pending deadlines and hearings in other
5 matters.

6 **A. Discovery Completed to Date**

7 The parties have exchanged their initial Rule 26 Disclosures and several supplements.
8 The parties each propounded and responded to written discovery (Interrogatories, Requests for
9 Admissions and Requests for Production of Documents). Expert Reports were timely disclosed
10 and the deposition of Plaintiff was taken. Discovery closed on December 31, 2020.

11 **B. Discovery Remaining to be Completed**

12 No further discovery is needed.

13 **C. Reason for Request for Extension of Dispositive Motion Deadline**

14 As stated above, Counsel has numerous other deadlines around the same time that the
15 current dispositive motion deadline is set. As such, the parties are requesting this brief extension
16 at this time.

17 **D. Proposed Extended Deadline for Dispositive Motions**

18 Accordingly, the parties respectfully request that this Court enter an order as follows:

19 (1) Dispositive Motions.

20 The parties request the current deadline of February 1, 2021 be extended to February 22,
21 2021.

22 This request for an extension is made in good faith and joined by all the parties in this
23 case. This request is timely and being requested in advance as the parties anticipate additional
24 time will be needed to prepare motions. Trial is not yet set in this matter and dispositive motions

1 have not yet been filed. Accordingly, this extension will not delay this case. Moreover, since
2 this request is a joint request, neither party will be prejudiced. The extension will allow the
3 parties the necessary time to prepare motions.

4 DATED this 13th day of January, 2021.

5 HATFIELD & ASSOCIATES, LTD.

KAEMPFER CROWELL


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16
17
18 IT IS SO ORDERED:

19 
20 UNITED STATES MAGISTRATE JUDGE
CASE NO.: 2:18-cv-00169-RFB-BNW